

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
2010 Quadrennial Regulatory Review, Review of)	MB Docket No. 09-182
The Commission's Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
)	
Promoting Diversification of Ownership in the)	MB Docket No. 07-294
Broadcasting Services)	

COMMENTS OF
THE UNIVERSITY OF SOUTHERN CALIFORNIA ANNENBERG SCHOOL
FOR COMMUNICATION & JOURNALISM ON BEHALF OF THE
COMMUNICATION POLICY RESEARCH NETWORK

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SUMMARY

The University of Southern California Annenberg School for Communication & Journalism (ASCJ) has convened a national consortium of non-partisan and multidisciplinary social scientists, legal scholars, journalists, and communication experts, henceforth known as the *Communication Policy Research Network* (CPRN). This group has spent the past year collaborating on media policy analysis relevant to the broadcast ownership policy concerns that were raised by the Third Circuit Court of Appeals' rulings in *Prometheus Radio Project v. FCC*¹.

The Commission's reliance on economic and market-oriented measures of performance have not adequately addressed the complexity and impact of the media ownership rules on localism, including issues of production, coverage, and consumption of local news. Furthermore, the FCC's narrow focus on market-oriented measures has inhibited its ability to meet its broader public interest mandate, including determining the availability of local news; and the potential impact of new media technologies on the Commission's policy goals of localism and diversity. In addition, the agency's data-collection methods do not adequately allow the public or the FCC to measure the efficacy (or lack thereof) of the Commission's current rules in advancing overall diversity goals, including greater ownership opportunities for minority, underserved minority, and female-owned entities.

In order to properly evaluate the Commission's current framework for addressing the policy goals of competition, localism, and diversity, the Communication Policy Research Network (CPRN) advocates for a more holistic research approach that provides more nuanced data on ownership across the entire spectrum of platforms and range of communities in American society. Multi- or interdisciplinary approaches to analyses of media can address these gaps by providing a more comprehensive picture to the Commission and policy makers of the entire media ecosystem, from ownership to consumption, while still producing generalizable findings across all media markets.

¹ 652 F.3d 431 (3d Cir. 2011).

Comments of Communication Policy Research Network (CPRN)

I. Introduction

The **Communication Policy Research Network (CPRN)**, representing more than thirty scholars and practitioners from the University of Southern California Annenberg School for Communication & Journalism and its Center on Communication Leadership & Policy, as well as a national consortium of leading universities and think tanks (see complete list attached), respectfully submit comments in response to the Notice of Proposed Rulemaking (“NPRM”) in the above-referenced proceeding. The CPRN represents a national, non-partisan and multidisciplinary association of social scientists, legal scholars, journalists and communication experts. This group has spent the past year collaborating on media policy analysis, focused in particular on the broadcast ownership policy concerns that were raised by the Third Circuit Court of Appeals’ rulings in *Prometheus Radio Project v. FCC*², in regard to the 2006 *Quadrennial Regulatory Review*³ (the “2008 Order”), and in the separate order, *Promoting Diversity of Ownership in the Broadcasting Services*⁴ (the “Diversity Order”).

The CPRN addresses in particular the foundational research and data collection measures that support the media ownership rules and proposed changes thereto. These comments build upon prior FCC policy proceedings and court cases, specifically, the Commission’s media ownership proceedings and the Third Circuit Court of Appeals’ remands in the two *Prometheus* cases. These comments address methodologies that can be employed to define, measure and reevaluate the public interest goals of localism, competition, and diversity.

The CPRN respectfully urges the Commission to adopt interdisciplinary approaches to analyses of media that can adequately provide more nuanced data on the nexus between the media ownership rules and the Commission’s policy goals, while taking account of new technologies and changing marketplace conditions.

II. Reliance on Economic Measures Alone to Evaluate the Impact of Media Market Structures on the Commission’s Goals May Be Arbitrary and Capricious

The Telecommunications Act of 1996 requires the FCC to review its broadcast ownership rules quadrennially to determine whether media concentration rules are “necessary in the public interest as the result of competition” and to “repeal or modify any regulation it determines to be no longer in the public interest.”⁵ Under 5 U.S.C. § 706 of

² 652 F.3d 431 (3d Cir. 2011).

³ 2006 Quadrennial Regulatory Review—Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Report and Order and Order on Reconsideration, 23 F.C.C.R. 2010, 2055-56, (Dec. 18 2007).

⁴ Promoting Diversification of Ownership in the Broadcasting Services, 2006 Quadrennial Regulatory Review—Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Report and Order and Third Further Notice of Proposed Rulemaking, 23 F.C.C.R. 5922, (Dec. 18, 2007).

⁵ §202(h), 110 Stat. at 111-12.

the Administrative Procedure Act (“APA”), the Commission’s actions, findings and conclusions will be held unlawful if they are found to be “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law ... [or] unsupported by substantial evidence.”⁶

In *Prometheus II*, the Third Circuit Court of Appeals summarized the §202(h) standard:

In a periodic review under § 202(h), the Commission is required to determine whether its then-extant rules remain useful in the public interest; if no longer useful, they must be repealed or modified. Yet no matter what the Commission decides to do to any particular rule—retain, repeal, or modify (whether to make more or less stringent)—it must do so in the public interest and support its decision with a reasoned analysis.⁷

Failure to provide a reasoned analysis for ownership rules may once again lead the Third Circuit to remand those rules to the FCC. In 2004, the Third Circuit remanded the bulk of the Commission’s ownership decision, ruling that the Commission failed to justify its “Cross-Media Limits” and its modification of numerical limits on broadcast licenses with reasoned analysis.⁸ While the court did not “object in principle to the Commission’s reliance” on accepted measures of market concentration such as the ‘Herfindahl - Hirschman Index’ (HHI) as a starting point, the court also was critical of the FCC’s Diversity Index on a number of fronts.

Among the court’s major criticisms were the following: 1) the Commission erred in including the Internet in its calculus due to the limited extent to which on-line sources provide—and are utilized for obtaining—local news and public affairs information; 2) the Commission was inconsistent in its reliance on media usage information in its calculus—utilizing such information at the level of the different media technologies, but not utilizing such information in terms of the usage of different outlets (e.g. broadcast stations) within different technologies; and 3) that the Commission failed to adequately justify its decision not to engage in any assessment of the content of individual media outlets, despite the fact that the Commission emphasized the availability of news and public affairs content as central to the “diversity importance” of individual information sources.⁹

The Commission now seeks comment on the eleven media ownership studies¹⁰ it released in August 2011. These studies were intended to evaluate the impact of local media market structure on the Commission’s policy goals. However, as the Third Circuit suggested in 2004, analysis focused on media market structure does not necessarily take

⁶ 5 U.S.C. § 706(2)(a).

⁷ 652 F.3d 431, 445 (3d Cir. 2011).

⁸ *Prometheus Radio Project v. Federal Communications Commission*, 373 F.3d 372, 382 (3d Cir. 2004), cert. denied, 125 S. Ct. 2904 (2005).

⁹ *Ibid.* at 406-408.

¹⁰ NPRM at ¶ 10.

into account technology impacts, nor does it adequately capture the full range of the impact of ownership rules on the Commission's longstanding policy goals. It is questionable whether the Third Circuit, or indeed the legislators receiving this report, would consider these shortcomings reasonable.

Furthermore, a recently conducted review of forty-two FCC-sponsored studies, from 1981 to 2011, examining the nexus of media ownership, employment and content, reveals that the Commission's studies were fundamentally flawed, and so grounded in quantitative methodology and economic-centric they were largely blind to the impact of Commission media ownership rules on diverse communities.¹¹ (*See attached*)

While the Commission's research drawing on economic and market-oriented studies is clearly a useful part of the analysis necessary to support regulation, the absence of other social science tools is a significant disservice to the Commission's public interest goals. The focus on market-oriented studies has failed to produce a robust understanding of the activity of the full range of licensees, from low to full-power licensees and their ability to reach all segments of American society. It also has limited the FCC's ability to gather the full scope of information about differentiated communities' needs for and interaction with critical information, necessary to promote an environment conducive to antagonistic, diverse voices. This focus on a market-oriented disciplinary approach limits the FCC's ability to gather invaluable data on the nexus between media ownership and the Commission's public interest goals.

The methodologies that the Commission has relied on only provide partial information about the dynamics in local media ecologies and the interaction between the American public and all forms of media. In this regard, the public, legislators, and the courts may find that the Commission is acting unreasonably. Due to the overly narrow and more static focus, prevailing methodologies and research cannot adequately serve the FCC's policy goals, and therefore, need to be supplemented with a wider range of research and analysis.

A more effective approach to addressing current and future public interest policy goals would be for the Commission to sponsor and engage in multi-and interdisciplinary empirical research that reflects the full range of developments, concerns, and policy objectives associated with FCC-regulated media industries. As the Commission articulated in the NPRM, a major challenge in this proceeding is to take account of new technologies and changing marketplace conditions while ensuring that the media ownership rules continue to support the Commission's policy goals.¹² By supporting approaches that combine multiple perspectives on media ecosystems¹³, the Commission can extract more

¹¹ Dam Hee Kim, *The Triangle of Minority Ownership, Employment and Content: A Review of Studies of Minority Ownership and Diversity* (manuscript prepared under the direction of the FCC's Associate General Counsel/Chief Diversity Officer, Mark Lloyd in the Office of General Counsel) (Summer 2011).

¹² NPRM at ¶ 1.

¹³ Media ecosystems refer to the entire media-scape, consisting of a multi-layered, hierarchical overlay of dynamic networks that cut across all of the media platforms including radio and television broadcasting, print news, and digital media. Media ecosystems also encompass the entire range of relevant actors and organizations engaged in the production, ownership, distribution and consumption of news and critical information. Their complexity necessarily poses challenges for their measurement and generalizability.

precise data that can sufficiently redefine the public interest in light of emerging technologies and shifting market trends.

Case studies of media ecologies offer a rich but more amorphous picture of the dynamics of participation and access relevant to FCC policy making. Alternatives include hybrid methodologies such as agent-based modeling and various forms of automated content analysis, rather than merely “counting” sources. Combining this approach with the Commission’s traditional use of economic analysis may be especially revealing of the impact of existing media ownership rules.

There are in fact a number of data resources available that can complement existing FCC sponsored studies. These include the Metamorphosis project and data set of ethnic media ecologies developed by Prof. Sandra Ball-Rokeach (USC Annenberg School). Among other findings, this research has pointed to the salience of “ethnic” media in the diversity of voices in local communities. (Mathew Matsaganis, Vikki S. Katz, & Sandra J. Ball-Rokeach, *Understanding Ethnic Media: Producers, Consumers and Societies*. (2011)) In addition, important data collection efforts are underway under the leadership of Professors Lew Friedland at University of Wisconsin-Madison examining the relationship between diverse media ecosystems and addressing the important civic information needs of local communities. (Carmen Sirianni and Lewis A. Friedland, *The Civic Renewal Movement: Community and Democracy in the United States* (Kettering Foundation Press: 2005)).

III. Multidisciplinary Approaches Will Improve the Commission’s Data Gathering to Better Satisfy the Commission’s Policy Goals.

Multi- and Interdisciplinary Research

As stated in the NPRM, the Commission “reaffirmed that media ownership rules are necessary to further the Commission’s longstanding policy goals of fostering competition, localism and diversity.”¹⁴ In the NOI, the FCC sought comment on how these public interest goals should be “defined and measured and on whether there are additional goals the Commission should consider.”¹⁵ In the NPRM, the Commission invites such comment again, while taking account of new technologies and changing marketplace conditions.¹⁶

To date, the data collected in preparation for the biennial ownership reports and the media ownership studies have provided an inconclusive and inadequate evidentiary basis for assessing the Commission’s ownership rules and policy goals. The Commission recognizes that its survey of licensees does not result in full compliance, and the Commission acknowledges that it must improve its data gathering efforts. While this is to be commended, CPRN suggests that the Commission utilize alternative approaches to data gathering.

¹⁴ NPRM at ¶ 10.

¹⁵ *Id.*

¹⁶ NPRM at ¶ 1, ¶ 10.

Research that incorporates multiple media platforms, for example, can provide the Commission with a greater understanding of the interrelationship between media ownership and its public interest goals. There have been, over the years, a variety of efforts, initiated by a variety of stakeholders (government agencies, academics, activists, NGOs, etc.) to assess one or more dimensions of local media ecosystems. However these efforts have tended to use different metrics to measure different outcomes; one of the goals of the Communication Policy Research Network (CPRN) is to coordinate such efforts to support this new paradigm. Studies that tend to focus on broadcasting, for example, will not capture the fact that broadcasters now often produce and distribute content not only for radio or television but also for websites and digital distribution to reach different, wider audiences as well as to supplement the information delivered by traditional means. The fact that broadcasters are active members of the cyber community is ably reported in the Commission's study on the Information Needs of Communities (2011). However, this multi-platform activity needs to be understood in light of the interactive media ecosystem. Broadcast ownership diversity and media services that extend across media platforms cannot be reasonably measured, or regulated without a comprehensive understanding of the entire system.

Linking quantitative and qualitative studies to produce both aggregated data *and* specificity in findings will give the Commission a more complete picture of the true impact of its policies regarding the policy goals of competition, localism and diversity. This kind of multidisciplinary analysis by definition draws on information, data, techniques, concepts, and theories from a variety of disciplines, including interdisciplinary research, that integrates multiple specialized bodies of knowledge. As the National Academies have noted, such cross-disciplinary approaches can be used to “advance fundamental understanding or to solve problems whose solutions are beyond the scope of a single discipline or area of research practice.”¹⁷

A media ecosystem approach is one of several analytic approaches that can comprehensively provide more *insightful* and more *nuanced* ways of measuring diversity and its value. This approach can be very effective in addressing the entire range of the Commission's diversity concerns, from licensing policies to new measures and approaches to eligibility standards (including potentially targeted preferences) to achieve its diversity goals.

Multi- and Interdisciplinary Approaches Can Advance the Commission's Analysis of Local News

The Commission reaffirmed that a major goal of the rules is to “encourage the provision of local news.”¹⁸ Localism policy is “designed to ensure that each station treats the significant needs and issues of the community that it is licensed to serve with the programming that it offers.”¹⁹ However, the failure of many local outlets to meet this

¹⁷ See Committee on Facilitating Interdisciplinary Research, Committee on Science, Engineering, and Public Policy (2004). Facilitating interdisciplinary research. National Academies. Washington: National Academy Press, p. 2.

¹⁸ NPRM at ¶ 6.

¹⁹ NPRM at ¶ 14.

standard is well documented. For example, a 2010 study from the Norman Lear Center at the USC Annenberg School for Communication & Journalism found that local news in Los Angeles devotes just 8:17 of its thirty-minute newscast to the kind of “hard” news that the FCC is designed to ensure; less time than is spent on advertisements (8:25).²⁰ Studies by the New America Foundation of various other local media ecologies (e.g. of Minneapolis, MN; of Scranton, PA; of Seattle, WA; of “The Research Triangle” in NC; and of Washington, DC) have documented similar shortcomings in local commercial news.²¹

Yet these same studies, and others, described below, show that the news-scape in the twenty-first century consists not just of local television news outlets and local newspapers – indeed, increasingly less so as newspapers continue to experience financial hardship – but of emerging communication networks involving social media, micro-local web-only news outlets, and informal, inter-personal communication networks. These nascent sources for local news are vital not only for day-to-day information needs but also in emergencies, but are virtually ignored by current FCC studies and policies.

Approaches that draw from both quantitative and qualitative models and combine perspectives on media ecosystems, network inclusion/exclusion, digital divide framework, and the process/position model, among others, will allow the Commission to more effectively define, measure, and evaluate its policy goals. In considering emerging technologies, the Commission seeks comment on whether, and how, to reevaluate localism “to account for changes in the way consumers get local news.”²² Research that cuts across multiple platforms can more fully assess the impact of new media and broadband technologies on such issues. For example, the “Metamorphosis” project, a media ecology study led by Sandra Ball-Rokeach at USC, examines a neighborhood’s “communication infrastructure” using census data, broadband adoption data, focus groups, and content analysis to study media use as it is actually practiced. With regard to issues of localism in the digital age, interdisciplinary approaches are best equipped to address important questions including: Who produces what? How much is produced? How does news and information flow? Are news outlets producing original content or simply re-purposing content acquired from other sources? Who is involved in producing information and to what kind of information will the audience actually listen? It is therefore essential for the Commission to adopt interdisciplinary communication studies approaches in order to properly reevaluate its policy goals in light of new media technologies.

Multi- and Interdisciplinary Approaches Can Advance the Commission’s Analysis of Diversity

The Commission invites comment on the aspects of the Commission’s 2008 Diversity Order that the Third Circuit remanded in *Prometheus II*.²³ There, the Court

²⁰ Martin Kaplan & Matthew Hale, *Local TV News in the Los Angeles Media Market: Are Stations Serving the Public Interest?*, at 2 (Mar. 11, 2010) available at <http://www.learcenter.org/pdf/LANews2010.pdf>. Non-local news and sports/weather accounted for (7:27) and (3:36), respectively.

²¹ New America Foundation, Media Policy Initiative; Washington DC case study available at http://newamerica.net/publications/policy/an_information_community_case_study_washington_dc.

²² NPRM at ¶ 15.

²³ NPRM at ¶ 9.

determined that the Commission's revenue-based "eligible entity" definition was arbitrary and capricious.²⁴ The Commission requests comment on how its ownership rules can "promote greater minority and women ownership of broadcast stations"²⁵ and also seeks comment on its conclusion that its "policy goals of competition, localism, and diversity are the appropriate framework within which to evaluate and address minority and female interests as they relate to the media ownership rules."²⁶

Again, the Commission's overwhelming reliance on market-oriented measures and definitions has failed to provide the substantive and aggregated data necessary for the Commission to fulfill its public interest mandate. Multi- and interdisciplinary research by a combination of social scientists, economists, communication specialists, journalists, and legal experts can provide perspectives drawn from a wider set of information sources to answer the Commission's questions regarding the nexus between media ownership and racial and gender diversity. For example, George and Waldfogel (2003) studied the effect of local demographics on newspaper content. They looked at large commercial newspapers, which have high fixed costs and rely on advertising for funding (two crucial caveats, as we will discuss shortly). They found that when the number of minorities in a community increases, minorities are more likely to buy the newspaper, with the implication that the content has moved closer to their preferences. By contrast, an increase in the white population makes minorities *less likely* to read, but does not affect white newspaper reading.

George and Waldfogel's (2003) research offers important insights into an environment where news outlets are constrained by high fixed costs and a reliance on advertising. As they state, "When there are no fixed costs, suppliers can offer a continuum of products so that each consumer is targeted by some product(s). When fixed costs are high, by contrast, the market selects only a subset of the conceivable alternatives for production" (p. 767). This research also touches on the relationship between demographic diversity and the introduction of the Internet, its relatively low barriers to entry and the resulting greater degree of potential diversity in terms of sources and content. In this environment, every niche audience is more likely to be served, resulting in a more diverse news environment (of course, this assumes access to broadband and to computers). Thus far, media ecosystem research has shown that content responds not only to ownership and funding structures, but also to the degree of demographic diversity in an area.

Examples of current interdisciplinary research that would help inform the FCC's diversity goals include Steve Wildman's research on an economic framework for assessing the merits of arguments that broadcast markets as they currently operate generate outcomes that are biased against interests of minorities, and whether minority owners do a better job serving the interests of minority viewers and listeners than do non-minority owners. Rahul Tongia and Ernest Wilson's research employing a new framework for modeling network exclusion offers another interdisciplinary approach that can address the Commission's concerns regarding the availability of local news and its relation to local media ownership,

²⁴ *Prometheus Radio Project v. FCC*, 652 F.3d 431, 471 (3d Cir. 2011).

²⁵ NPRM at ¶ 9.

²⁶ NPRM at ¶ 20.

and the impact of ownership rules on minorities and females.²⁷ New America Foundation's qualitative analyses of the media at the city level may also provide insight regarding future approaches.²⁸ As mentioned above, in order for the Commission to properly evaluate its current framework for addressing the policy goals of diversity, the FCC needs to adopt a more holistic approach to gather and generate more nuanced data on media ownership across the entire spectrum of platforms and diverse communities in American society.

IV. Conclusion

For the foregoing reasons, the USC Annenberg School for Communication & Journalism and the other members of the Communication Policy Research Network, respectfully urge the Commission to incorporate and sponsor interdisciplinary approaches that combine diverse perspectives and research that cuts across multiple platforms, in order to adequately analyze the nexus between the media ownership rules and the Commission's public interest goals of competition, localism and diversity.

Respectfully submitted,

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²⁷ Rahul Tongia & Ernest J. Wilson, *The Flip Side of Metcalfe's Law: Multiple and Growing Costs of Network Exclusion*, International Journal of Communication 5 (2011), 665-681.

²⁸ See http://mediapolicy.newamerica.net/information_communities for details on studies of Washington, D.C.; Minneapolis - St Paul, M.N.; The Triangle Region, N.C.; Scranton, P.A.; Seattle, W.A.